



Lawrence Livermore National Laboratory



Environmental Protection Department

July 7, 2003

Ms. Luz Castillo, Senior Hazardous Substances Scientist
Statewide Compliance Division
Department of Toxic Substances Control
700 Heinz Avenue
Berkeley, CA 94710-2737

**Subject: Response to the 2003 Compliance Evaluation Inspection (CEI) Report
Livermore Site
Lawrence Livermore National Laboratory (LLNL)**

Dear Ms. Castillo:

This letter is being submitted as a response to the Inspection Report (dated May 29, 2003) resulting from the Compliance Evaluation Inspection (CEI) that the DTSC conducted at LLNL on March 17, 18, 19, and 21, 2003. In your letter, you requested that LLNL submit documentation which demonstrates a Radioactive and Hazardous Waste Management (RHWM) Division employee's completion of three courses, and answers to specific questions pertaining to the process which generated a specific wastestream (W103241) containing trichloroethylene (PCE) prior to stabilization.

As indicated on the attached training record, Mr. Bertao completed the following specific courses within six months of his newly assigned job title of Field Technician on the following dates:

- Course HS4610-CBT entitled "Basic Air Purifying Respirator Training," completed on 5/13/03,
- Course HS4630-S entitled "SCBA Interspiro/Spiromatic-Specific," completed on 5/14/03,
- Course HS5690-CERT entitled "Incidental Crane Safety Certification," completed on 5/8/03.

Pertaining to the waste containing PCE, Waste Disposal Requisition (WDR) Number W103241, you requested that LLNL provide you with the name, job title, and job description of the waste generator, and the specific process that generated the waste (how the PCE was used in the process that generated the wastestream).

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As described in the May 28, 2003 email, LLNL is unable to provide the requested information related to the source of the PCE for the following reasons:

- 1) the process used by LLNL's onsite laboratory Chemistry and Environmental Services (CES) to archive multiple soil residues while samples are being analyzed does not require CES representatives to track the origin of the samples, the processes which occurred in areas where the soil samples were collected, or the individuals who performed work in the areas where the soil samples were collected, and
- 2) the archived soil residues are managed as samples according to the sample exclusion specified in 22 CCR, Section 66261.4 (d), and are not considered wastes until combined by a visual process with other archived soil residues prior to the point when the single container of combined soil residues is considered one wastestream (i.e., W103241).

The following describes the method that CES representatives routinely follow when processing soil samples for analysis.

As CES receives soil samples, a portion of the sample is used for analysis and the remaining sample (referred to as a "sample residue") is archived at CES until the analysis is complete. Once a certain volume of sample residues are generated after analyses are completed on multiple soil samples, all archived sample residues are composited into one container. At that time, the container of sampling residue is declared a waste, and the appropriate label is placed on the container according to generator knowledge and/or analytical results. The CES representative who composites the sample residues into one container becomes the waste generator since this person generates the container of sample dumping waste. As part of the characterization process, RHWL only assigns EPA codes to wastes when the program from where the soil sample originates is able to provide specific process information to the CES representative.

With regard to wastestream W103241, although the CES representative had not received any process information concerning PCE in the solid sample, RHWL initially assigned the F002 EPA code as a conservative measure. When RHWL was able to confirm the absence of process information, RHWL removed the F002 EPA code from the waste through a Waste Change Request Form. Stabilization was then performed for the sole purpose of removing hazardous characteristics from the waste since EPA codes did not have to be considered as part of the evaluation of Universal Treatment Standard (UTS) criteria.

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In addition, according to the sample exclusion in 22 CCR, Section 66261.4(d), CES is not required to manage samples received as waste since the samples are received for the sole purpose of testing to determine the samples' characteristics or composition. By the time the sample residues are composited into one container and one wastestream, the CES representative cannot determine which sample a particular contaminant originated from since this sample exclusion allows CES to process samples without having to track such information.

Please contact Vicki Salvo of my staff at (925) 423-5432 if you have any questions regarding this response.

Sincerely,



Ellen Raber, Department Head

ER/VS:cp

Attachment: Training Record

July 2, 2003

Ms. Luz Castillo

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cc:

T. BeLue	L-546
J. Bowers	L-786
K. Cadwell	L-786
B. Fischer	L-546
S. Goodwin	L-623
C. S. Jackson	L-633
T. Kato	L-627
S. Kidd	L-620
R. Michalik	L-633
J. Morris	L-786
E. Raber	L-626
K. Rauhut	L-701
V. Salvo	L-627
S. Terusaki	L-627
J. Vukelich	L-626